

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**RACHEL RAMSBOTTOM,
ALEXIS BOWLING,
JENNA HOUSTON,
JANE DOE #1**

Plaintiffs,

v.

**LORIN ASHTON,
AMORPHOUS MUSIC, INC.,
BASSNECTAR TOURING, INC.,
REDLIGHT MANAGEMENT, INC.,
C3 PRESENTS, L.L.C.,
INTERACTIVE GIVING FUND,
GNARLOS INDUSTRIES, LLC, :
CARLOS DONOHUE; ABC :
CORPORATIONS, ONE THROUGH
TEN (said Names Being Fictitious),
JOHN DOES, ONE THROUGH TEN
(said Names Being Fictitious)
Defendants.**

CIVIL ACTION

No. 3:21-cv-00272

JURY TRIAL DEMANDED

**C3 PRESENTS, L.L.C.'S MOTION TO DISMISS PLAINTIFFS' AMENDED
COMPLAINT AGAINST C3 PRESENTS**

C3 Presents, L.L.C. ("C3 Presents") respectfully moves this Court to dismiss Plaintiffs' Amended Complaint against C3 Presents pursuant to Rule 12(b)(3) and (b)(6) of the Federal Rules of Civil Procedure for improper venue and for failure to state a claim upon which relief can be granted. In filing this Motion, C3 Presents relies on its supporting Memorandum of Law, which is filed contemporaneously herewith and incorporated by reference herein. In support of this Motion, C3 Presents states as follows:

1. Plaintiffs Rachel Ramsbottom, Alexis Bowling, Jenna Houston, and Jane Doe #1 ("Plaintiffs") are former fans of EDM artist Lorin Ashton (hereinafter "Bassnectar"), who allege

that Bassnectar abused his position of fame and power to traffic and solicit child pornography from them when they were minors.

2. C3 Presents is a concert and live event promoter and promotes, among other things, the Music City Wine and Food Festival, Austin City Limits, and the Lollapalooza festivals worldwide. C3 Presents has worked with Bassnectar, along with countless other artists, in its capacity as a concert promoter and music manager.

3. On May 7, 2021, Plaintiffs filed their Amended Complaint against Bassnectar and several other entities, including C3 Presents. The Complaint asserts claims against Bassnectar for conduct in violation of the Trafficking Victim Protection Reauthorization Act (“TVPRA”), benefitting from a sex-trafficking venture in violation of the TVPRA, receipt and possession of child pornography, and negligence per se. The sole claim asserted against C3 Presents is for benefitting from sex-trafficking venture in violation of the TVPRA.

4. At the outset, Plaintiffs inconsistently define the “Bassnectar Companies” to initially exclude C3 Presents, but later to include C3 Presents. This prevents C3 Presents from being on notice of the exact factual allegations that Plaintiffs assert against it. Even if Plaintiffs had consistently defined the “Bassnectar Companies,” Plaintiffs would still impermissibly engage in group pleading that lumps together the entity defendants despite the very different roles they played in Bassnectar’s career. Such group pleading also fails to put C3 Presents and the other entity defendants on notice of what they each allegedly did in violation of the TVPRA.

5. Plaintiffs fail to state a TVPRA beneficiary claim against C3 Presents as they have not demonstrated that C3 Presents participated in a particular or specific *sex-trafficking* venture with Bassnectar. Rather, Plaintiffs rely solely on conclusory allegations about C3 Presents’ participation.

6. Moreover, Plaintiffs have not sufficiently shown that C3 Presents “knew or should have known” that Bassnectar was engaged in a sex-trafficking venture. Instead, Plaintiffs emphasize the contrary: that Bassnectar’s allegedly exploitive conduct was highly secretive.

7. In addition, Plaintiffs have not demonstrated that C3 Presents “knowingly benefitted” from Bassnectar’s alleged sex-trafficking venture. Plaintiffs’ rote recitation of the “knowingly benefitted” element of a TVPRA claim—without more—is insufficient to withstand a motion to dismiss.

8. Venue is also improper in the Middle District of Tennessee. The Amended Complaint demonstrates that only one of the four Plaintiffs interacted with any of the Defendants in Tennessee. Plaintiffs make no effort to describe in detail this interaction, or provide details for C3 Presents to assess whether this Tennessee event even occurred in the Middle District.

WHEREFORE, C3 Presents respectfully requests that this Court dismiss Plaintiffs’ Complaint against C3 Presents with prejudice.

Respectfully submitted,

/s/ Russell B. Morgan

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document is being served through the Court's Electronic Filing System, or via U.S. Mail, first class postage prepaid, to all other parties on June 1, 2021:

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